

Manufactured Homes Commission
Minutes of Meeting Held On
July 18, 2023 at 10:30 am
Worcester Chamber of Commerce & Remotely and via MS Teams

CALL TO ORDER: 10:40 am

In Attendance: Ethan Mascoop and Dan Less (AGO) were in person at the Worcester Chamber of Commerce.

Jeffrey Hallahan, Tracey Sharkey, and Tyler Newhall (EOHLC) appeared remotely via MS Teams.

Guests: Christopher Jee (EOHLC) and Lois Martin (AGO)

Absent: Sandra Overlock

Vacancies: One Member

It was generally agreed there was a quorum for this hybrid meeting.

Mr. Less introduced everyone.

APPROVAL OF MINUTES

Discussion: Mr. Mascoop asked Mr. Hallahan and Ms. Sharkey if they had read the minutes and noted that he and thought they were accurate. Mr. Hallahan and Ms. Sharkey said they had, and approved. Mr. Mascoop made a motion to approve the minutes from April 18, 2023.

Mr. Less seconded the motion.

Vote: Unanimously in favor.

With no one from the public attending at that time, Mr. Mascoop said he would hold off on the public forum for the time being and said we would return to that.

CORRESPONDENCE/COMMUNICATION

New Manufactured Housing Office at HUD

Mr. Mascoop noted that HUD just established an independent office of Manufactured Housing, which meant an increase in importance in these issues. Implementing new safety construction standards and other positive changes. He said this issue should be on the agenda for the next meeting. Mr. Less noted he has a lot of questions as well. He said HUD can be hard to reach. He said if possible, he would like to invite to the Mike Henretty from Virginia who is familiar with the HUD requirement and once spoke to the commission a few years ago. Mr. Less said he would like to know if the creation of this office would help Massachusetts residents get in touch with HUD when they have complaints about home installations. Frequently the AGO must refer residents with installation questions to HUD, but too often residents don't anyone or get any call back. Mr. Less said he would call and try to Mr. Henretty.

MH Commission Meeting Minutes

July 18, 2023

Page 2

Mr. Jee said the Manufactured Housing Consensus Committee has information regarding this issue on their website; it does look like there will be a public component. Mr. Jee said he will distribute the link in the comments.

OLD BUSINESS

Parkway Manufactured Housing Community in Revere

Mr. Mascoop moved on to the Parkway discontinuance in Revere. He said he visited the park last weekend and there was only one unit left with a family of four residing in it. At the last Commission meeting, their water had been turned off. Houses have been removed, partly or entirely demolished. There is a pot-holed roadway that leads to the last unit occupied, in an isolated area. There are wetlands and asbestos issues that are slowing the process down, as well. Mr. Mascoop talked about the Transportation-Oriented Development Zones information broadcast on WBUR, the same zones the students had in their report.

Mr. Less said the water was restored to the one family. He explained that the AGO made several calls between the city's solicitor and the Parkway's attorney but it was restored within a day. Mr. Less also noted that the two-year lease for family is up in August, and if the family wants compensation as a result of the discontinuance, they need to resolve that with Parkway in the next few weeks or else they will have to move without receiving compensation. Mr. Less said that the AGO has spoken with counsel, and has one complaint the AGO is working to resolve. Mr. Less emphasized that if any resident has a problem in any community, they need to file a complaint with AGO. Getting hearsay complaints from third parties is not sufficient. He explained the AGO's complaint process and how the AGO attempts to resolve them.

Mr. Mascoop said Parkway is one of the more tragic results; a lot of people renting, some squatters, many elderly people, and not well organized. He suggested maybe Mr. Less might be able to see if there was some way the AGO could look into reports of extreme situations if it had reliable information even if there were no complaints filed. Mr. Less said that he could look into that and there may be some protocols for that in other areas of the office that could be used in the manufactured housing context.

Local Boards of Health Enforcement

Ms. Sharkey said she asked the Department of Public Health about a letter she wrote to all boards of health about their responsibilities of licensing and inspection of manufactured housing communities that had been on their website and was taken down. She said many letters were taken down during their reorganization, but this letter was never put back up.

Mr. Less said AGO still had a copy of the letter and that it was important to keep local boards of health aware that they had a responsibility for enforcing the state sanitary code and the manufactured housing laws in manufactured housing communities. Mr. Mascoop added that the

MH Commission Meeting Minutes

July 18, 2023

Page 3

boards of health are also responsible for licensing manufactured housing communities, that they have to step up, and having the letter on-line will be a constant reminder.

Mr. Less asked if letter might have a bigger impact if DPH emailed it to the local health departments rather than having passively sit on a website. Ms. Sharkey said they could do an e-mail blast to the boards of health, in view of the new sanitary code updates. Mr. Mascoop said they could get an e-mail list for the Commission to do that. Ms. Sharkey made a motion to do this; Mr. Halladay seconded it. Unanimous approval.

Transit-Oriented Development

Mr. Mascoop talked about the presentation that two of his Boston University graduate students gave to the Commission at the first quarter meeting in April 2023. The students were currently on summer vacation and not available for the present meeting but they had prepared a follow-up memo that Mr. Mascoop had emailed to the commission members and encouraged them to read it. Mr. Mascoop referenced a table in the memo listing transit-oriented areas within ½ or 1 mile of transit. Some of the communities are rent controlled, some with an owner, some co-ops, some are not zoned as resident areas, but as business or commercial areas. Mr. Mascoop said that the Executive Office of Housing and Livable Communities (“EOHLC”) should remember these communities exist and should protect these communities from development. Mr. Jee noted that private development details are not open to the community and Mr. Mascoop recommended EOHLC make zoning recommendations and notify the Commission of changes. Mr. Mascoop asked Mr. Jee what EOHLC was doing to protect these communities. Mr. Jee responded that each municipality would have their own procedure for this type of development. Mr. Mascoop asked what information is available to the public and whether the public could obtain the information from either the municipality and/or EOHLC? Mr. Jee said they could file a public records request with his agency. Mr. Less noted that if the response concerned policy development, that could be an exemption to the public records law and might not be included in a response. Mr. Mascoop asked Mr. Less and Mr. Jee how the Commission can raise awareness that these parks are at risk, so it does not have to deal with these problems after the fact. Mr. Jee said that he could convey the memo to the MBTA Commission Group. He said he could also connect Mr. Mascoop to other people within EOHLC. Mr. Jee asked Mr. Mascoop to send him an e-mail with all the information (including the students’ deck and memo) and he forward it to the right people in EOHLC.

Mr. Mascoop asked Mr. Halladay and Ms. Sharkey to read the memo for their comments at the next meeting.

Mr. Halladay said there was no incentive in the zoning act for cities and towns to keep MHCs and asked if anyone had discussed the municipalities taking MHC by eminent domain. Mr. Mascoop replied that he was not aware of any discussions. Mr. Halladay said the rights of the residents would be better served by a municipality than a developer. Mr. Mascoop stated that he thought it be easier for them to get rid of the community rather than trying to run it.

MH Commission Meeting Minutes

July 18, 2023

Page 4

Ms. Sharkey said she doubted cities and towns wanted this burden unless there was some incentive from the state. Mr. Halladay said the state has an interest in affordable housing and that it would be “a win-win” situation for everyone because it would get rid of blight. Mr. Mascoop said the students did not think of this and thought was worthy of consideration.

Request for Attorney General’s Opinion

Mr. Mascoop asked Mr. Less whether the Attorney General’s Office had responded to the Commission’s question it submitted to the AGO at the last meeting: “In response to the letter from the Attorney General dated April 12, 2023, in which the Attorney General did not provide a legal opinion, the Commission is requesting clarification for the original request for a legal opinion under G.L. c. 12, § 3.” Mr. Less responded that the AGO’s Constitutional and Administrative Law Division (CADLAW) was responsible for issuing opinions and they informed him that would not be responding to any further requests for opinions on this issue from the Commission. He also noted that CADLAW did not provide an explanation why they would not respond to this question and would not be responding in writing. Mr. Mascoop said that in his opinion G.L. c. 12, § 3 required the AGO to issue in response to the Commission’s request. He also told Mr. Less the AGO was not responding to the decision of the Peabody Rent Control Board would not consider “good faith” as a basis to deny Mac’s Trailer Park’s request for discontinuance contrary to the requirements of the Manufactured Housing Statute.

Mr. Less responded that this was a municipality decision and municipalities are separate government entities distinct and independent of the AGO’s jurisdiction. As such, they are free to interpret the statute’s requirements and the AGO had no authority to tell them otherwise. He noted this was not any uncommon situation with other laws and referenced licenses for used car dealers as an example in which municipalities differed in their opinion of how they interpreted the statute that authorized them to issue those licenses.

Using the Parkway discontinuance in Revere and the Mac’s request for a discontinuance in Peabody as examples, Mr. Less explained that G.L. c. 140, § 32L(8) discontinuance provisions gave municipalities the option of requiring an MHC owner to obtain a license to discontinue. He explained that § 32L(8) did not require all cities and towns to determine whether an MHC should be allowed to discontinue. Mr. Less noted that Peabody had a by-law requiring Mac’s to obtain a license. He stated that Revere had no such by-law. Mr. Less explained that as a result, the owner of Parkway could just close the community down without having to request approval from Revere while Mac’s had to ask Peabody for approval and the Peabody hearing officer recommended denying the request. Mr. Less further explained that since Peabody had enacted a by-law requiring owners to obtain discontinuance licenses, it was their responsibility to interpret § 32L(8)’s “good faith requirements” as they were the entity making that determination.

Ms. Sharkey responded that she still believed what happened in Revere was wrong and asked how this situation could be prevented in the future. Mr. Less said the solution would be to change § 32L(8) to make it require all municipalities to require owners to obtain discontinuance licenses. Ms. Sharkey asked if the Revere residents could still bring a G.L. c. 93A law suit against Parkway’s owner asserting they violated § 32L(8)? Mr. Less responded that he did not

MH Commission Meeting Minutes

July 18, 2023

Page 5

know and could not offer an opinion on this. He noted that if the residents wanted to challenge the discontinuance via c. 93A, the AGO's website has a model c. 93A Demand Letter and information on how to act pro-se.

Returning to the issue of whether the Commission should respond to the AGO's answers to the Commission's questions, Ms. Sharkey stated that the issue was over while Mr. Mascoop stated that it merited further discussion.

NEW BUSINESS

Mr. Mascoop asked Mr. Jee to explain the name change of his agency from the Division of Housing and Community Development to Executive Office of Housing and Livable Communities. Mr. Jee said his office became an executive-level agency under Gov. Healey, and their name was changed to reflect this rise in their stature. Their role regarding in the area of manufactured housing rules and the Commission remained the same.

Mr. Mascoop moved on to the vacancy on the Commission and opened discussion recruiting a person to fill the vacancy who could apply to the Governor's Office for the appointment. He asked Mr. Less if they needed two residents on the Commission. Mr. Less replied that G.L. c. 6, § 108 only required one owner and one resident and there was no prohibition against more than one resident and/or more than one owner. Mr. Mascoop noted that he thought the member should be another resident and asked if any of the members had any suggestions of people who may be interested in joining the Commission. Mr. Halladay thought it was important that the new member be a resident of an owner run community as opposed to a resident owned community since the one resident member presently on the Commission lives in a coop. Ms. Sharkey said Commission member Sandy Overlock (who was not present at the meeting) could have the kind of outreach capability the Commission needs. She said the Governor's Office for Commissions and Boards have a list of pre-qualified people they could use. Mr. Less asked if the Governor's Office was aware the Commission was looking. Ms. Sharkey did not know, but said she knows this Office from being on another Board. Mr. Mascoop said he would reach out to Sandy Overlock and the Governor's Office..

Mr. Mascoop asked if the meeting should stay hybrid? Mr. Halladay said it made things easier for him because he could attend on his phone. Ms. Starkey also likes the hybrid meetings, and noted that since not a lot of the public are coming to meetings lately, she would like to keep hybrid if possible. She also said that it is important work affecting residents' rights, though, and it is important to have some meetings in person. Mr. Less, noting he books locations for in-person meetings, said it can be difficult to find locations equipped for hybrid meetings. He did not think all meetings had to be hybrid and could be split between hybrid and virtual, but he thought it was important at least once a year all the Commission members could meet in person. Mr. Halladay agreed, but it is important to keep hybrid meetings to be ready when the next pandemic hits—however far away it may be.

MH Commission Meeting Minutes

July 18, 2023

Page 6

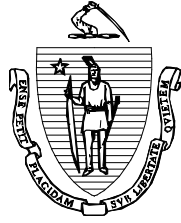
Mr. Mascoop asked if there was a traditional place to hold the fall meeting. Everyone liked the idea of meeting in Plymouth in the fall and Mr. Less said he would try to find a venue that could accommodate a hybrid meeting in Plymouth.

Given the hour, Mr. Mascoop said they could discuss the Annual Report at the next meeting. He said he felt it was important for all the Commissioners to be involved in writing the report.

PUBLIC FORUM

No public comments or questions.

At 12:37 pm., Mr. Halladay motioned to adjourn. Ms. Sharkey seconded.



Pursuant to the Massachusetts Open Meeting Law, G.L. c. 30A, §§ 18-25, notice is hereby given of a meeting of the MANUFACTURED HOME COMMISSION

Massachusetts General Laws, Chapter 6, Section 108, establishes the Manufactured Homes Commission. It is the mission of the Manufactured Homes Commission to provide prompt, impartial service to all parties affected by or concerned with matters pertaining to manufactured housing communities, to the maximum extent permitted by law.

**PUBLIC NOTICE
COMMONWEALTH OF MASSACHUSETTS**

MANUFACTURED HOME COMMISSION QUARTERLY MEETING

**Tuesday, July 18, 2023
10:30 AM to 12:30 PM**

IN PERSON OPTION:

Worcester Chamber of Commerce
311 Main Street, Suite 200
Worcester, MA 01608

REMOTE PARTICIPATION OPTIONS:

To attend the meeting through **video access**, please join the meeting by clicking on the following link: [Click here to join the meeting](#)

To attend the meeting through **audio access** only, please join the meeting by dialing:
Phone Number: 1-857-327-9245
Conference ID: 103 792 385#

This meeting is open to the public. All persons having business to be brought before the Commission are invited to participate either in person or remotely.

Commissioners:

Ethan Mascoop, Chair
Jeffrey Hallahan, Vice-Chair
Tracy Sharkey Commissioner
Sandy Overlock, Commissioner

Pursuant Chapter 2, of the Acts of 2023, suspending certain requirements of the Open Meeting Law, this meeting of the Manufactured Home Commission will be conducted through a combination of in person and remote participation as noted above to ensure that the public can adequately access the meeting in real time.

For further information contact: Chris Jee, EOHLC
christopher.jee@mass.gov
617-573-1313

For reasonable accommodations regarding this meeting, please contact 617-573-1102.

Please contact the Massachusetts Executive office of Housing and Livable Communities at (617) 5731100 for free language assistance.

Favor de comunicarse con la Oficina Ejecutiva de Vivienda y Comunidades Habitables (Executive Office of Housing and Livable Communities (EOHLC)) de Massachusetts en (617) 573-1100 para ayuda gratis con el idioma.

Entre em contato com o Escritório Executivo de Habitação e Comunidades Habitáveis (Executive Office of Housing and Livable Communities (EOHLC)) de Massachusetts no número (617) 573-1100 para obter assistência gratuita com o idioma.

Tanpri kontakte Biwo Lojman ak Kominote alimantè (Executive Office of Housing and Livable Communities (EOHLC)) Masachousèt la nan (617) 573-1100 pou asistans gratis nan lang.

如果您需要免费的语言翻译帮助，请联络麻州住宅及社区发展部 马萨诸塞州住房和宜居社区执行办公室(The Massachusetts Executive Office of Housing and Livable Communities (EOHLC)),联络方式(617) 573-1100。

Свяжитесь с сотрудником Исполнительное управление жилищного строительства и пригодных для жизни сообществ (Executive Office of Housing and Livable Communities (EOHLC)) Массачусетс на предмет оказания бесплатной помощи по переводу на иностранный язык. ((617) 573-1100)

សូមទំាក់ទំនងជាមួយអគ្គនាយកដ្ឋានសហគមន៍និងលំនៅឋានរដ្ឋម៉ាសាឈូសេត រង្វង់ប្រតិបត្តិការសហគមន៍និងលំនៅឋាន។(Massachusetts Executive Office of Housing and Livable Communities (EOHLC)) មរយៈ (617) 573-1100 ដើម្បីទទួលបានជំនួយ ផកយកតតិកែថា។

Vui lòng liên Văn phòng điều hành về nhà ở và cộng đồng đáng sống (Executive Office of Housing and Livable Communities (EOHLC)) Massachusetts tại (617) 573-1100 để được hỗ trợ ngôn ngữ miễn phí.

On July 12, 2023 this notice was posted at EOHLC Open Meeting Notices:

<https://www.mass.gov/service-details/dhcd-open-meeting-notices>

The Commonwealth of Massachusetts

Manufactured Homes Commission

100 Cambridge Street, Suite 300
Boston, MA 02114
(617) 573-1400

Second Quarter Meeting July 18, 2023
Worcester Chamber of Commerce, 311 Main St., Worcester, MA
(Remote Participation is Also Available)
10:30M – 12:30PM

AGENDA

- 10:30** **CALL TO ORDER**
Attendance and Introductions
- 10:35** **APPROVAL OF APRIL 2023 MINIUTES**
- 10:40** **CORRESPONDENCE/COMMUNICATIONS**
- 10:45** **OLD BUSINESS**
- Update on Parkway Discontinuance in Revere
 - Update on Transit Oriented Development Impact on MHCs
 - Status of Request for Opinion from the Attorney General's Office
- 11:30** **NEW BUSINESS**
- Department of Housing and Community Development is Now the Executive Office of Housing and Livable Communities
 - Recruitment to Fill Commission Member Vacancy
 - Future meetings - Locations, In-Person/Remote/Hybrid, Outreach to Encourage Public Participation
 - Annual Commission Report
- 12:00** **PUBLIC FORUM**
- 12:30** **ADJOURN**

COMMISSION MEMBERS

APPOINTED

Ethan Mascoop, Chair
Jeffery Hallahan, Assistant Chair
Sandra Overlock, Commissioner
Tracy Sharkey, Commissioner

EX-OFFICIO

Dan Less, Attorney General's Office

Tyler Newhall, Executive Office of Housing and Livable Communities

To: Ethan Mascoop, Chair of the Manufactured Homes Commission

From: Naomi Gross & Erika Teetsel, MPH Candidates in Environmental Health at Boston University & Manufactured Housing Advocates

Date: 27 April, 2023

Re: Multi-family Zoning Districts Under Section 3A of the Zoning Act - Protecting Existing Residents of Manufactured Home Parks

Manufactured housing parks (MHPs) provide affordable housing options for thousands of Massachusetts residents. However, these communities are facing an increasing threat of displacement from the new Section of the Zoning Act, focusing on Transit Oriented Development (TOD). TOD seeks to create high-density, mixed-use developments around transit hubs. As a result, the Commission must take action to ensure that MHPs are not displaced or destroyed by this new development focused statute. We recommend that census data be collected for park details and resident demographics as well as increasing your communication with DHCD.

Forced relocation associated with eviction or mass displacement resulting from development and gentrification has been a long-term problem for low-income communities. Rates of eviction have been increasing in the United States due to rising rents, rising utility costs, decreasing incomes, and decreasing investment in federal and state housing assistance. Massachusetts has the fastest growing rental rates in the nation, with rising costs heavily impacting low-income families. To address this housing crisis, in 2022, Massachusetts state passed Section 3A of the Zoning Act. This focuses on Transit Oriented Development (TOD) with the goal of increasing high-density multi-family housing near transit stops. Cities and towns qualify by having either a MBTA stop, a Commuter Rail stop, a Ferry stop, or being an adjacent city/town to one of those transit stops. There are 175 cities and towns that fall under this definition. To achieve compliance Cities and Towns have to create multi-family zoning districts within approximately one-half mile from MBTA stations. While this law is an important step forward in addressing the state's housing crisis, we are concerned about the unintended consequences to MHPs that were not considered during the drafting of this law.

Massachusetts has approximately 250 manufactured home parks (MHP), and 143 of these MHPs fall within a MBTA community. Thirty MHPs fall within 1 mile of MBTA stations, and 12 MHPs within a ½ mile radius of MBTA stations. This close proximity increases their risk of displacement and redevelopment due to their potential to be rezoned as multi-family housing. By re-zoning these MHPs, and allowing "as of right" development minimal protections and oversight are afforded to MHPs and residents. To address the increased vulnerability, we respectfully recommend the following actions:

1. Conduct a physical census of all Massachusetts Manufactured Home Parks and Resident demographics.
 - a. The current data have gaps, and inaccuracies limiting its use and effectiveness in assessing location, risk, and demographics of MHPs.
 - b. Survey all MHPs to identify those using septic systems, public and private well use, with a focus on identifying possible PFAS contamination.
 - c. This will not only improve future research, but it will also provide a deeper understanding of who exactly is being impacted by this and future issues.

- d. Finally, the commission can use this as a tool for relationship development with the communities.
2. Advocate to update “Massachusetts General Laws Chapter 6, Section 108: Manufactured homes commission; members; duties; compensation” to include new language for zoning proposals with DHCD.
 - a. The current enabling statute states that the Commission “may develop, with the Department of Housing and Community Development (DHCD), proposals for specific zoning standards to be applicable to new manufactured housing communities in order to ensure that all such new communities are well designed, attractive, and suited to the needs of manufactured homeowners;”.
 - b. We recommend that language be updated to include existing communities as well, so if/when zoning issues emerge, there is guidance.
 - c. (eg) *In conjunction with the department of housing and community development, the commission may develop proposals for specific zoning standards to be applicable **for the protection of existing and new** manufactured housing communities in order to ensure that all such ~~new~~ communities are well designed, attractive, and suited to meeting the needs of manufactured home ~~owners~~ residents **including any time zoning policies are under discussion by municipalities.***
3. Request certified zoning maps and action plans for every town in Massachusetts from the Attorney General office DHCD respectively.
 - a. Certified zoning maps are the only effective way of assessing zoning at the parcel level which is needed to further assess risk of MHPs.
 - b. If the MHP Commission has the opportunity to assess the submitted action plans, the commission could proactively support MHP residents and their homes.
 - c. Advocate for MassGIS to include municipal zoning maps as additional layer available to the public.
4. Partner with DHCD as they develop guidelines related to Section 3a of the Zoning Act, to ensure that existing manufactured home parks are prioritized in their development.
 - a. This will be imperative for ongoing communication and advocacy of these parks.

If these recommendations are followed, we believe significant improvements will be seen in monitoring each park. Investing time in this today will allow for deeper analysis in research, increased protection, and oversight of MHPs, and connections with residents in the future.

For further discussion on the matter please contact us at:

Naomi Gross at ngross@bu.edu &
Erika Teetsel at eteetse@bu.edu

Technical Analysis

Background

Massachusetts has approximately 250 manufactured home parks in the state. Despite having the strongest legal protections for residents of manufactured homes in the country, many residents still live in a tenuous relationship as both renter and homeowner.¹

Nationally, manufactured homes make up that vast majority of unsubsidized housing, with approximately 18 million people living in manufactured homes across the US.^{2,3} Manufactured homes effectively have become a large portion of the low-income housing supply. Nationally, the rise of manufactured housing occurred in parallel to the rollback of federal and state funds for affordable and low-income housing.² Massachusetts has the third highest rental prices in the nation, making much of the housing and rental stock cost prohibitive to low-income residents.⁴ Manufactured home parks can be an affordable alternative to traditional housing.⁵

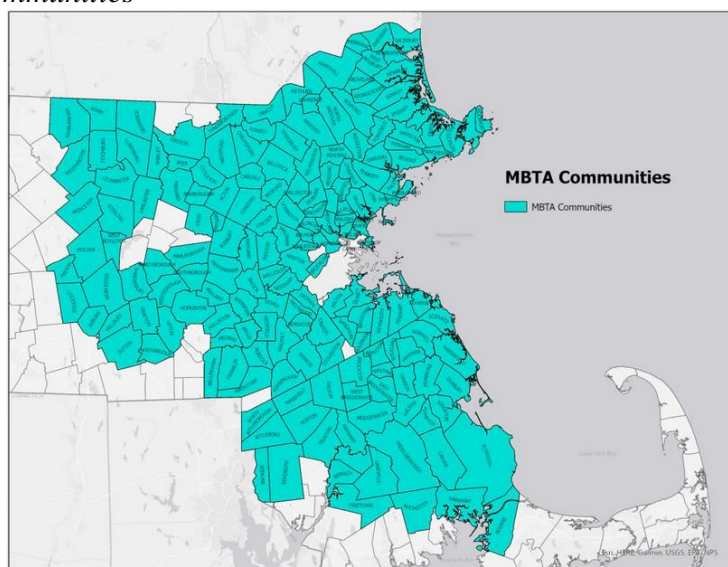
While manufactured homes become a primary option for many low-income residents, many residents live with high levels of housing insecurity. Manufactured homes are typically stationed in land-lease communities which grant individuals to be “halfway homeowners” meaning they own their homes but have no rights to the land underneath them.² These land-lease communities or Manufactured Home Parks are mainly developed and owned by private investors. Existing manufactured home parks are seen as a prime location for investment and development.⁶ With relative ease of demolition, parks that have been spatially separated and “visually screened” from outside view, and low-income residents that have less access to outside resources, allow for manufactured home parks to be mass-evicted, demolished, and developed.³ While national rates are unknown for manufactured home park closures, one study in Harris County Texas assessed the geospatial relationship of MHP closures.⁷ They found that closures clustered along near urban growth occurred and corresponded to new development. This study shows the intersection of urban redevelopment and low-income housing pressures that occur in primary metropolitan areas.⁷

Lee’s Trailer Park, located in Revere MA, just north of Boston, has been experiencing dissolution and displacement since November 6th, 2022.¹ In the minutes of an April 2021 meeting of the Massachusetts’s Manufactured Homes Commission, residents raised a number of concerns including land rental increases and concerns about the redevelopment of the land.⁸ Resident concerns quickly became reality when the park’s land was purchased by Greater Parkway Owners, LLC on July 17th, 2021.⁹ This LLC is registered to Oleg Uritsky, a real estate investor and entrepreneur. His past investments have been focused on land acquisition and new development projects which indicated his plans for this park.¹⁰ By December 2022, residents were pushed out and what was once a 100+ home park, was virtually abandoned and by April 2023 one family remained with the landowner illegally turning their water off on April 17th, 2023.⁸ Many residents struggled to find new housing, some relocated to a near-by complex parking lot. Due to the immobility of manufactured homes, residents were forced to leave possessions which were destroyed in the demolition process. It has been insinuated by the new owner that the reason for this purchase/demolition is related to the new transit oriented development (TOD) for MA.¹¹ Photos of demolition can be found in *Appendix 2*.

Transit Oriented Development and Section 3a of the Zoning Act

An MBTA community shall have a zoning ordinance or by-law that provides for at least 1 district of reasonable size in which multi-family housing is permitted as of right; provided, however, that such multi-family housing shall be without age restrictions and shall be suitable for families with children. For the purposes of this section, a district of reasonable size shall: (i) have a minimum gross density of 15 units per acre, subject to any further limitations imposed by section 40 of chapter 131 and title 5 of the state environmental code established pursuant to section 13 of chapter 21A; and (ii) be located not more than 0.5 miles from a commuter rail station, subway station, ferry terminal or bus station, if applicable.¹²

Visual 1: MBTA Communities¹³



Massachusetts is facing its own urban redevelopment plan. In 2022, the state passed Section 3A of the Zoning Act: which focuses on Transit Oriented Development, or TOD, with the goal of increasing high-density multi-family housing near transit hubs. This statute requires that all MBTA communities have at least one zoning district for multi-family housing with a minimum gross density of 15 units per acre, located a half-mile from transit stations. 175 cities and towns across the eastern portion of the state qualify by having either a MBTA stop, a Commuter Rail stop, a Ferry stop, or being an adjacent city/town to one of those transit stops. MBTA communities that do not comply with this zoning development will not be eligible for funds from the Housing Choice Initiative or MassWorks.¹⁴

The state empowered DHCD with the power to create guidelines and evaluate compliance, implementation, and assessment. Cities and Towns had to submit their initial Action Plans to DHCD by January 31, 2023, with different town categories having different submission deadlines for the district compliance application between December 31, 2023, and December 31, 2025. By the district compliance deadlines Cities and Towns need to have implemented the approved zoning districts meaning that they have passed through zoning board approvals and possibly town meetings.¹⁴

To achieve compliance Cities and Towns have to create multi-family zoning districts within approximately one-half mile from MBTA stations. These districts create a multi-family

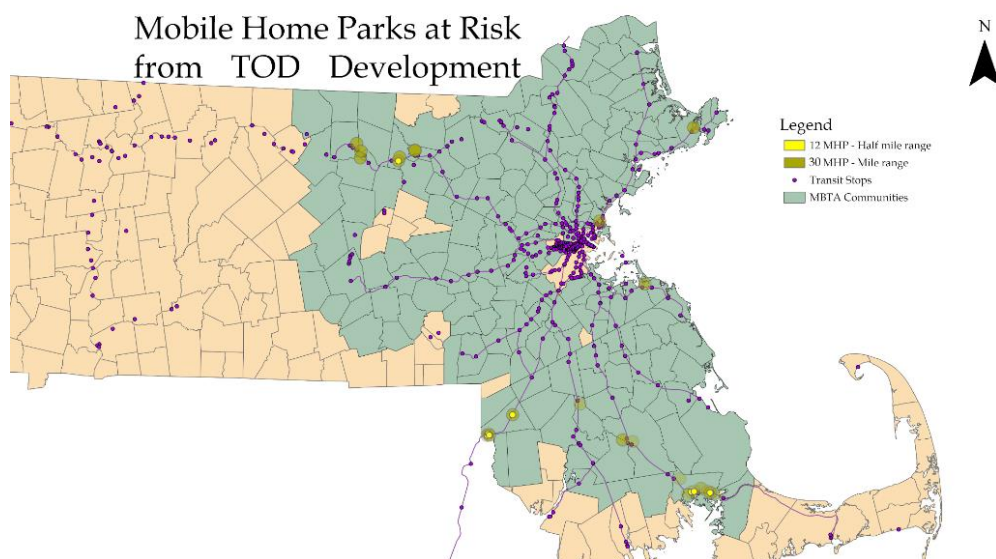
zoning district that allows development “as of right” meaning that developers do not need to seek additional approval from zoning boards to develop.^{14,15} In addition to this requirement cities and towns are also not allowed to implement standards such as environmental building standards, higher energy efficiency standards, and affordable housing quotas above 10%. These requirements are included to ensure the easiest path forward for development of multi-family housing, however, they will potentially lead to a maintenance or decrease in affordable housing, since existing housing stock will be demolished prior to new multi-family housing development occurring.

As with Revere, cities and towns may choose to rezone land current housing MHPs into their new multi-family zoning districts.¹⁶ As MHPs generally exist as unsubsidized affordable housing with rent below median rental prices, the displacement and development of MFHs under 3a’s requirements could lead to an overall decrease of affordable housing rather than an increase.^{2,15} This is in direct opposition to the state’s overall objective of responding to the cost of living crisis.

The creation of a multi-family zone district does not automatically condemn all existing housing stock within a zoning district into new development, rather it creates the possibility and ease for developers to develop. On the other hand, due to the developmental possibility and housing insecurity experienced by many MHPs, the risk displacement is increased for MHPs within a ½ mile or mile radius of MBTA stations.¹⁵

Of the 175 cities and towns only four towns (Berkley, Holden, Marshfield, and Middleboro) have not submitted action plans putting them at risk of losing the funds listed above.¹⁷ These action plans are not yet in the public record, therefore assessing development and displacement risk to MHPs within these 175 cities and towns is based on proximity and other factors. From initial GIS assessment 30 MHPs fall within 1 mile of MBTA stations, and 12 MHPs within a ½ mile radius of MBTA stations. These 30 MHPs are clustered in two main areas across the state with a cluster in north, central Massachusetts near Fitchburg, and another near Wareham. A list of these MHPs can be found in *Table 3a of Appendix 1*.

Visual 2: MHPs at Risk from TOD Development due to Geographic Proximity



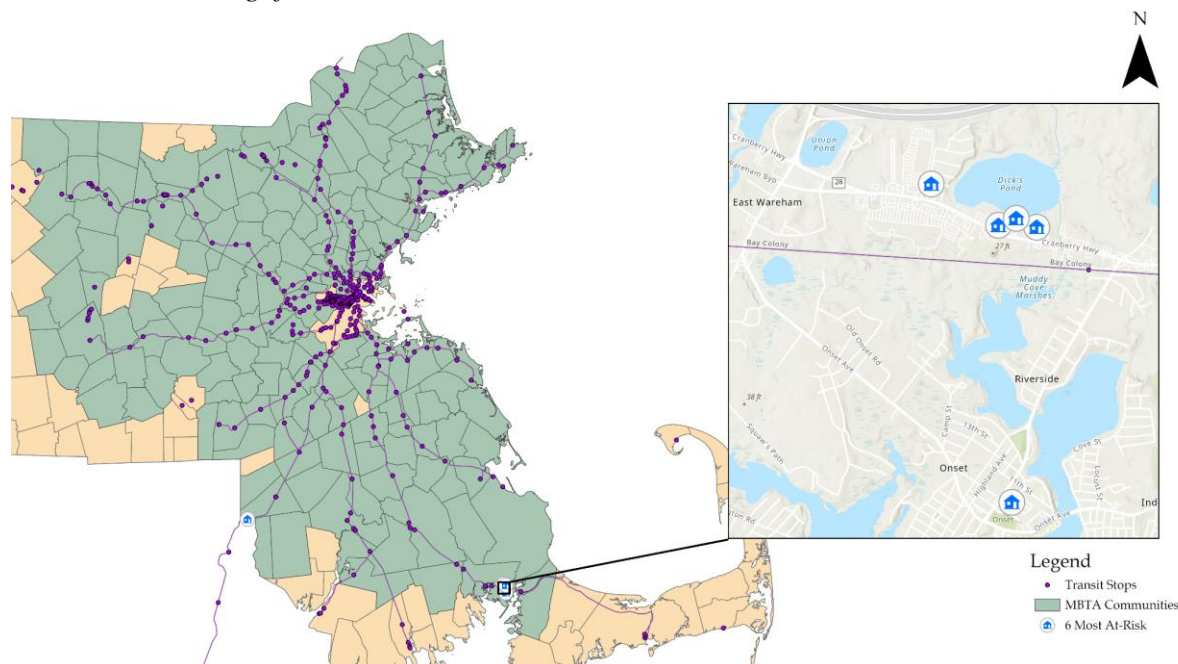
When assessing the risk of displacement to these parks current Massachusetts statute heavily influences risk. Massachusetts has one of the most protective sets of laws associated with MHP closure of any state.¹⁸ Currently, if park owners wish to sell or close the park they must give residents 2 years notice. If at least half the tenants form an association, said association has “right of first refusal” meaning that the park owners must first offer to sell the park to the tenant prior to placing it on the open market. These standards, along with park rules, are overseen by the Office of the Attorney General, and the DHCD.¹⁸ However in practice, as seen in Revere, these oversight systems have not been effective at stopping MHP closure and displacement.^{19,20}

In addition to the protective standards listed above, some Cities and Towns have also implemented rent control (also known as rent stabilization) specifically for MHPs.¹⁸ These rent control boards provide additional oversight at the town level on the relationship between landowner and MHP resident. This oversight and additional standards can substantially decrease risk to MHPs development. Currently only 2 of the 13 cities and towns with MHPs designated at risk have rent control boards. These are Middleborough, with two MHP’s within half mile distance of transit station, and Raynham, with one MHP’s within a half mile distance of transit station. Attleboro, with six MHP’s within half mile distance of transit station, recently attempted to pass a rent control board, however progress was halted in the state house.²¹

Cities and Towns can zone for multi-family housing in four general ways: “a) existing residential neighborhoods; b) the commercial areas of historic downtowns and village centers, near residences; c) modern strip mall corridors, also near neighborhoods but slightly more buffered, with fewer cross streets; and d) isolated places on municipal and metropolitan peripheries, like parcels tucked between highways, tracks, water, and nature reserves.”¹⁵ These first two ways generally face the most push back with these zoning changes seen as towns and residents being concerned over “changing the character of their town” and seen as a threat to existing homeowners.¹⁵ To increase the political will of zoning projects cities and towns create Multi-Family Housing zones in the final two ways; by rezoning commercial and isolated areas into multi-family zoning.¹⁵ Unfortunately these two zoning possibilities are often where MHPs are often located.² Additionally, a number of the MHPs are not currently zoned residential, but rather fall within commercial zoning districts. This means that MHPs that are already zoned commercial are potentially at increased risk of rezoning and therefore of displacement and development.

Of the 12 MHPs currently within a half mile radius of MBTA stations, 6 MHPs are currently zoned commercial, increasing their risk of displacement and re-development. Effectively these MHPs have been “zoned out” of future existence. Additionally, many towns including Wareham have no zoning district where MHPs can exist or be developed in current zoning by-laws.²² The current MHPs that reside are grandfathered in, however if ownership changes the likelihood of discontinuance is heightened. If municipalities choose the more politically viable option combining with municipal stigmatization for MHPs, these MHPs are at the greatest risk of displacement.

Visual 3: Manufactured Home Parks at Increased Risk from TOD Development due to existing Commercial zoning, focus on Wareham, MA



Demographics At Risk

These 30 MHPs are clustered in two main areas across the state with a cluster in north, central Massachusetts near Fitchburg and another near Wareham. These clusters are on the outer bounds of the MBTA communities which mirror the geospatial trends found in Harris County. While specific demographic data are not available for these park residents, looking at the demographic information from the Census block groups containing these MHPs shows that the majority of residents are White and non-Hispanic.²³ They have a median household income of \$77,624, which compares to Massachusetts median household income of \$89,026. *View Table 1.*²⁴

Census tracts containing at-risk MHPs were used to obtain demographic data on SNAP usage and Disability Status. This was the smallest level data available for this information. The data showed there are a total of 13,676 households. Around 19% of those households receive SNAP. Additionally, out of all homes that fall within a census tract containing a MHP, 31% have one or more persons with a disability. *View Table 2.*²⁵

Comparatively, within the entire state of Massachusetts, only 12% of households receive SNAP. Out of those households, 51% have one or more persons with a disability. Overall, roughly 24% of Massachusetts households have one or more persons with a disability. This is a substantially smaller percentage compared to tracts containing MHPs. However, it is unsurprising that the State level data has a smaller percentage of households using SNAP and persons with a disability as the median household income is nearly \$12,000 higher. Overall, census tracts containing at-risk MHPs have lower median income and higher SNAP and disability status, which all indicate, or can lead to, worsened health outcomes. *View Table 2.*

Health Outcomes Associated with Manufactured Housing

Manufactured home parks have a deep history in the U.S. and a large part of that history is restrictive zoning regulations.²⁶ The historic zoning created separation between mobile home parks and “conventional” residential zoning, leading to the development of self-contained/walled off communities.⁶ This separation led to manufactured home parks being zoned nearer to industrial areas and highways, as well as increased the environmental hazards that residents face, and socially and spatially marginalized manufactured home park residents.² Along with these external health concerns, there are structural aspects of manufactured homes that can negatively affect residents' health. While not a comprehensive list, some of these hazards include asbestos, poor water quality,²⁷ chronic dampness (commonly referred to as mold),²⁸ and formaldehyde exposure.²⁹

Formaldehyde is a colorless gas that is produced both anthropogenically and by natural sources.³⁰ Billions of pounds of formaldehyde are produced in the United States annually, of which approximately one-half is used in the wood products industry.³¹ For the context of manufactured homes, it is used in the production of some plywood/particle board and resins.³⁰ Formaldehyde exposure can occur through inhalation, ingestion, or dermal exposure. When looking specifically at the exposure to “off-gassing”, inhalation is the primary exposure route of concern. The U.S. Department of Housing and Urban Development (HUD) has set standards for formaldehyde emissions in mobile homes of <0.2 parts per million (ppm) for plywood and <0.3 ppm for particle board. These standards are designed to result in an ambient air level of 0.4 ppm or less.³⁰ A study found a sample of mobile homes to be measured at 0.02 ppm to 0.8 ppm, with levels as high as 4 ppm. The primary health outcome associated with exposure is irritation of the skin, eyes, nose, and throat.³⁰ However, cancer has been also associated with chronic exposure and/or high levels of exposure. Off-gassing of formaldehyde primarily occurs for 2-5 years after installation, with individuals who spend the majority of their day inside their home at increased vulnerability to exposure.³⁰ Since formaldehyde is chemical irritant that also causes hypersensitivity reactions, it is possible that it might produce more symptoms among people with chronic respiratory illnesses and allergy problems.³² Based on synthetic estimation from census data shown in *Appendix 1: Table 1 and 3*, residents of manufactured home parks are more likely to have low socioeconomic status, and have at least one disability. Therefore, the susceptibility and vulnerability of residents increases to formaldehyde exposure which can lead to long term health impacts discussed above.³³ Furthermore, newer homes built after 1990 are more insulated, so less air moves in and out of the homes. Reduced airflow and poor can allow formaldehyde to persist in the home as well as other hazards such as chronic dampness.

Poor ventilation can lead to worsened exposure to formaldehyde as well as chronic dampness (mold). Manufactured homes are also at an increased risk of chronic dampness, which creates the conditions for mold growth. Health effects associated with chronic dampness include asthma (new and worsened), upper and lower respiratory symptoms, eye irritation, and dermatological issues, even after potentially confounding factors such as income, social class, smoking, crowding, and unemployment are controlled for.^{34,35} Furthermore, outside of mold, this combination of water intrusion and poor ventilation provides a nurturing environment for mites, roaches, and respiratory viruses, all of which play a role in respiratory disease development.³⁵

MHPs also run the risk of poor water quality. A study completed on a MHP in California tested the microbial contamination of water which resulted in variable concentrations of the selected microorganisms such as E coli and salmonella. There were a few physico-chemical parameters that the researchers identified as contributing to poor water quality.²⁷ Researchers

found that 46% of the MHPs tap water samples fell outside of the pH Secondary Maximum Contaminant Levels of 6.5 to 8.5, as established by the EPA. The pH of water is important because it influences other physico-chemical parameters and the presence of metal ions. More acidic pH levels may cause corrosion of pipe metals, which can contaminate drinking water. Basic pH levels may cause pipes to form deposits.²⁷ Additionally, due to the reliance on wells that many MHPs have, microbial contamination and physico-chemical parameters are likely under-tested. This lack of testing of drinking water can lead to long-term microbial and physico-chemical contamination exposure which has health impacts. For example, heavy metals released from pipes resulting from changes in pH could have negative impacts both acute and chronic.³⁶ These can include organ damage, disruption in growth, immune system function, and increased risk of cancer.³⁶

Another study found that living in a mobile home, and especially in a park community, is significantly and negatively correlated with water service reliability.³⁷ Many mobile home residents rely on drinking water supplies from park operators or other small private water systems. These systems may be more prone to water quality and supply issues compared to public water systems. One such hazard that has been reported at high levels in manufactured housing communities is Polyfluoroalkyl substances (PFAS).³⁸ This class of chemicals has been shown to accumulate in people's bodies and are associated with cancer, liver damage, decreased response to vaccines, immunodeficiencies, etc.³⁹

MHPs are also more likely to use septic systems for their wastewater disposal, compared to the general population.⁴⁰ Pollution from malfunctioning or improperly designed septic systems can result in the contamination of drinking water supplies with pathogens and the addition of excess nitrogen and phosphorus to surface and groundwaters.⁴⁰ Many communities have reported severe septic issues such as sewage backing up into their homes or spilling over onto the community land.⁴¹ In extreme cases, mobile home parks have been shut down by local governments due to failing septic tanks that left raw sewage standing on park grounds.⁴⁰ Exposure to sewage and wastewater can have negative effects on health. This grey- and black-water can contain bacteria, fungi, parasites, and viruses that can cause intestinal, lung, and other infections. Exposure to these bacteria may cause symptoms such as diarrhea, fever, cramps, headaches, and weakness. Examples of the types of bacteria and diseases carried by sewage and wastewater are *E. coli*, shigellosis, typhoid fever, salmonella, and cholera.^{42,43}

These health outcomes are particularly concerning for residents that already live within insecure housing conditions. Despite the possibility of exposure to these hazards, many residents choose to stay in substandard housing they can afford rather than risk financial insecurity, and risk of displacement from living in more expensive but potentially less hazardous housing.

Health Outcomes Associated with Displacement

Developers and city officials often use the health hazards discussed in the previous section to justify the removal of MHPs despite the associated health impacts of losing access to unsubsidized affordable housing, displacement and informal eviction.³ This was seen in Revere's MHP, where researchers and lawyers were stonewalled by the City's zoning and planning boards. These boards refused to provide documentation discussing rezoning or demolition permits, confirming residents' statements that the town was actively seeking the community's removal.

There is a stigma surrounding MHP's and their residents, they are often referred to as "trailer trash".² This is maintained through zoning codes, which often prohibit parks in single-

family residential areas.³ Municipal zoning laws perpetuate the stigmatization of MHP's and residents, and keep the epithet "trailer trash" alive. This encapsulates the priorities of urban policy and highlights the process of urban redevelopment which can be a process of "taking out the trash".² This mentality can lead directly to increase health and safety risk for park residents who are often offered little oversight regarding their health and safety concerns, and can lead to increased risk of park dissolution and mass displacement.

Eviction or mass displacement associated with development and gentrification has been a long-term problem for urban poor communities. Evictions have been increasing in the United States due to rising rents, rising utility costs, decreasing incomes, and decreasing investment in federal and state housing assistance.^{2,13} This triad of housing pressures is particularly true in Massachusetts as well, as Massachusetts has the fastest growing rental rates in the nation, with rising costs heavily impacting low-income families and the primary driver of homelessness.

While there is next to no literature on the impacts of MHP closures on residents, there is a growing body of literature on the effects that eviction and displacement has on individuals. Eviction has been shown to lead to increased stress, material loss, depression, and worsening physical health outcomes in both parents and children.⁴⁴ The threat of eviction and displacement and the subsequent associated trauma of eviction is significantly related to high levels of material loss, negative mental health outcomes including depression, anxiety, psychological distress, and suicide, and negative physical health outcomes including poor self-reported health, high blood pressure and child maltreatment.^{44,45} Additionally, eviction can lead to individuals and families moving into unsafe living environments. This can include substandard housing and overcrowded living conditions.⁴⁶ All of these also can increase risk of lasting health issues.⁴⁷ These health outcomes are also compounded when assessed through lenses of inequity (gender, age, class, and ethnicity); with worse health outcomes associated with those with lower socio-economic status.^{48,49} Finally, a number of studies have shown that displacement leads to a disruption of community support and social ties, and social and economic resources; these all have been shown to cause adverse health outcomes such as psychological distress, increased stress, and hospitalizations due to drug and alcohol related issues.⁵⁰⁻⁵³

Eviction and displacement can also directly lead to homelessness. Due to the lower rental prices of MHs the possibility of homelessness after eviction increases. In Boston, a recent survey of individuals experiencing homelessness identified that finances were the main reason they were without a home.⁵⁴ This was corroborated through interviews with former residents of the Revere MHP. Many residents stated that they were now living in their cars, in either nearby parking-lots, or have returned to Mass and Cass, the central hub of homelessness services in the Greater Boston area.²⁰ Residents also echoed the financial realities found within the "Health of Boston Survey of People Experiencing Homelessness," with the majority of previous residents stating that they have been effectively priced out of the rental market.²⁰

Homelessness has been shown to have lasting effects on physical health outcomes. Comparing self-identified measures of health in Boston has shown that unhoused individuals are over twice as likely to report that both their physical and mental health was not good for 14 or more days in the past month.⁵⁴ This is consistent with national data, where people experiencing homelessness have poorer overall physical health with higher rates of TB, hypertension, asthma, and diabetes. Due to a lack of consistent access to medical care, hospitalization rates are also higher among individuals experiencing homelessness.⁵⁵ These comparative rates both in Boston, and in national research shows that eviction, displacement, and homelessness are strongly associated with negative health outcomes. The impact of these health outcomes on residents and

communities must be factored into the risk and benefits of Transit Oriented Development, and the consequences of this statute.

Risk Benefit Analysis

While cities and towns may point to the external and internal exposure to hazards and the subsequent health outcomes previously mentioned (e.g., exposure to formaldehyde leading to respiratory illness) as a reason to remove MHPs, the potential health outcomes of displacement and homelessness far outweigh the reality of living in substandard housing. Through a qualitative risk benefit analysis, and in discussion with residents displaced from Lee's Trailer Park in Revere, the comparative health impacts of people experiencing homelessness compared to housed individuals in Boston highlight the priority to maintain access to substandard housing.

Despite this qualitative risk and benefit analysis which points towards the priority of maintaining existing affordable housing in the form of manufactured home parks, outstanding questions remain regarding the relative health benefits and risk associated with living in substandard housing over experiencing homelessness.

There are a number of limitations to this analysis. While a growing field of study, the scope is still small and to fully understand the breadth of health outcomes associated with eviction requires more research. Much of the current research primarily looks at the impacts of displacement globally, and due to natural disasters. Research specifically into the health impacts of high rental prices, informal evictions, displacement due to gentrification and direct development in MHPs, and homelessness in all Massachusetts is needed.

Stakeholders

In order to best assess pathways to ensure the protection of MHP residents the following list of stakeholders have been identified.

MHP Residents	Manufactured home park residents face existing housing insecurity from being both tenants and homeowners within MHPs. The implementation of multi-family housing zoning districts covering their place MHP residents at increased risk of displacement with the possibility of no financial compensation. MHP residents are also at increased risk of displacement due to their average income and disability rates exacerbating the potential health and social consequences of eviction and displacement.
MHP Owners and Investors	Existing manufactured home parks are seen as a prime location for investment and development. With relative ease of demolition, parks that have been spatially separated and "visually screened" from outside view, and low-income residents that have less access to outside resources, allow for manufactured home parks to be mass-evicted, demolished, and developed easily. This ease of development means that investors see MHPs as lucrative investments. Online platforms targeting investors highlight MHPs potential. Owners and investors seek to gain from the rezoning, displacement, and redevelopment of MHPs.

Developers	MHPs are attractive parcels to developers. They are large parcels of land that already exist for development. Additionally, with the advent of 3a and the potential for multifamily use housing and the “as of right” developers have fewer barriers for them to develop MFHs. Developers seek to gain from the rezoning, displacement, and redevelopment of MHPs.
Cities and Town Zoning and Planning Boards	Due to Massachusetts “at home rule” cities and towns have authority over zoning. ⁵⁶ Therefore, despite TOD (section 3a) being implemented at the state level, all zoning districts and changes must go through cities and town zoning boards and town meetings in addition to being approved by DHCD. ¹⁴ Therefore it is within cities and towns zoning boards power to include existing MHPs in the new multifamily zoning districts.
Department of Housing and Community Development	DHCD is in charge of evaluation of the action plans that cities and towns submit. Any failure of MBTA communities to comply with the statute, DHCD will withhold funds under the Housing Choice Initiative. ¹⁴ DHCD will also determine whether zoning provisions allow for multi-family housing as of right consistent with the statute’s guidelines.
Massachusetts Bay Transportation Authority/Massachusetts Department of Transportation	MassDOT supports programs and projects that deliver a high return on investment. The MBTA, a division of MassDOT, acts as consultants to DHCD for the implementation and assessment of 3a. They support the assessment of city and town site plans to deem compliance with the statute. ⁵⁷ The MBTA seeks to gain ridership from new development which increases their funding sources.
Manufactured Homes Commission	The MHC exists to provide prompt, impartial service to those affected by or concerned with matters pertaining to manufactured housing communities, this includes residents and owners. The MHC may work with DHCD to develop proposals for specific zoning standards. Finally, the MHC files an annual report with many governmental bodies about the Commission’s activities and recommendations (drafts of legislation required to effect recommendations). This report can be used to file legislation that is protective of manufactured housing communities and residents, such as rent control boards, amending Section 3A, etc. ⁸

Executive Office of Housing and Economic Development	EOHED is marginally involved in Section 3A in regards to any failure of MBTA communities to comply with the statute. EOHED will review an MBTA community's progress in implementing its action plan prior to making an award of funds under the Massworks infrastructure program. This withholding of funds incentivizes MBTA communities to comply with the statutes guidelines and create more multi-family zoning. ¹⁴
General Court of the Commonwealth of Massachusetts (State Legislature)	The MA Legislature has 200 members elected by the people of the Commonwealth. They have the power to draft legislation and approve or rewrite the Governor's budget, both of which could be used to support the needs of underserved and vulnerable populations such as Manufactured Home Parks.
Rent Control Boards	If the park is rent-controlled, the park owner must get approval from the local rent control agency before increasing rents. ¹⁸ Rent control is on a 5 year cycle, and rent is funneled through the Rent Control Board. This makes illegal activity, such as buying out residents from their homes, much less likely. Applicable to Middleborough (two MHP's within half mile distance of transit station), and Raynham (one MHP's within half mile distance of transit station). ¹⁸
Office of the Attorney General	The Attorney General's Office is the legal arm of state. They are in charge of investigating any complaint raised by a MHP resident about conditions M.G.L. c.140, §§ 32A-32S, The Manufactured Housing Act. ⁵⁸ Along with the Director of the Department of Housing and Community Development, the Attorney General reviews all rules issued by Manufactured Home Park owners. The Office also has the authority to enforce the Manufactured Housing Act by bringing civil actions in court. ⁵⁸

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Appendix 1: Tables

Table 1: Manufactured Home Park Resident Break Down by Race

	Block Groups containing at Risk MHPs (22)	Massachusetts	
	%	N	%
Total Population		7,029,917	100%
Race			
Hispanic	10.6%	887,685	12.6%
Non-Hispanic	89.3%	6,142,232	87%
<i>White</i>	82.2%	4,748,897	67.5%
<i>Black</i>	3.6%	457,055	6.5%
<i>American Indian/Alaskan Native</i>	0.2%	9,387	0.1%
<i>Asian</i>	2.2%	504,900	7.2%
<i>Pacific Islander</i>	0%	1,607	0%
<i>Other</i>	1.6%	92,108	1.3%
<i>Two or more Races</i>	0.5%	346,871	0.3%
Income			
Median Household Income	\$77,624	\$89,026	

Table 2. Households in Census Tracts Containing MHP's That Receive SNAP Benefits & Have One or More Person in the Home with A Disability

	Total Households in Census Tracts Containing MHPs & SNAP Recipients		Massachusetts Homes That Receive SNAP	
	Total	%	Total	%
Homes w SNAP	2,577	19%	331,259	12%
Homes w/o SNAP	11,099	81%	2,383,189	88%
Total	13,676		2,714,448	
SNAP & Disability Status			SNAP & Disability Status	
Disability	1,369	53%	167,589	51%
No Disability	1,208	47%	163,670	49%
Total	2,577		331,259	
No Snap & Disability Status			No SNAP & Disability Status	
Disability	2,876	26%	478,930	20%
No Disability	8,223	74%	1,904,259	80%
Total	11,099		2,383,189	
Disability Status			Disability Status	
Total	4,245	31%	646,519	24%

Table 3a: At-Risk Manufactured Home Parks in Massachusetts

Key:

	Within 0.5 miles, zoned commercially
	Within 0.5 miles
	Within 1 mile
*	Rent Stabilization Board
**	Resident Owned Community

Town	Park Name	Address
Attleboro	Case Mobile Home Estates	44 Colvin Street
Attleboro	Eastland Park	1346 Newport Avenue
Attleboro	Liberty Estates	Liberty Drive
Attleboro	Red Oak Mobile Village	460 Collins Street
Attleboro	Tripp Mobile Home Park	548 Kenyon Avenue
Ayer	Hillside	25 Groton School Road
Ayer	Pine Knoll	11 Groton School Road
Fitchburg	Fitchburg Mobile Home Park	276 Lunenburg Street
Gloucester	Little River Campground	4 Stanwood Point
Hingham	Pocohontas Trailer Park	170 Rockland Street
Lakeville	Twin Coach Estates	Haskell Circle
Leominster	Dunwoody Mobile Home Park	602 North Main Street
Lunenburg	Whalom Mobile Home Village, Inc.	165 Summer Street
Middleborough*	Edgeway Mobile Home Park	Lyn Lane and Wesley Circle
Middleborough*	Hillcrest Mobile Home Community	79 East Grove Street
Raynham*	Shady Acres Mobile Home Park	1540 Broadway
Revere	Lee's Trailer Park	418 Revere Beach Pathway
Shirley	Briarwood Trailer Park	83 Front Street
Shirley	Wayside Trailer Park	47 Wayside Park, Shirley, MA
Wareham	Garden Homes Estates East	3040 Cranberry Highway
Wareham	Garden Homes Estates North	2750 Cranberry Highway
Wareham	Garden Homes Estates Pines	2750B Cranberry Highway
Wareham	Garden Homes Estates South	3132 Cranberry Highway
Wareham**	Lakeside Mobile Home Park	3030 Cranberry Highway
Wareham**	Mogan's Mobile Home Park, Inc.	3012 Cranberry Hwy, East Wareham, MA 02538
Wareham	Onset Beach Resort Mobile Home Park	32 Kins Ct, Onset, MA 02558
Wareham	Red Wing Estates	2900 Cranberry Highway
Wareham	Royal Crest	2340 Cranberry Highway
Wareham	Silver Lake Mobile Home Park	3024 Cranberry Highway
Wareham	Swifts Beach Mobile Home Park	8 Swifts Beach Road

Table 3b: All Manufactured Home Parks in Massachusetts

Key:

	Within 0.5 miles, zoned commercially
	Within 0.5 miles
	Within 1 mile
	Updated Park Address/Update Needed

Town	Park Name	Address
Acushnet	Acushnet Mobile Homes	922 Middle Road
Acushnet	Bay State Mobile Home Park and Sales	43 South Main Street
Acushnet	Brookside Mobile Home Park	1049 Main Street
Adams	Pinnacle Park	11 A Pinnacle Drive
Ashby	The Pines Campground	39 Davis Road
Athol	Millers Woods	739 Daniel Shays Highway
Athol	River Bend Woods	739 Daniel Shays Highway
Attleboro	Birchwood Mobile Home Park	1340 County St
Attleboro	Case Mobile Home Estates	44 Colvin Street
Attleboro	Eastland Park	1346 Newport Avenue
Attleboro	Liberty Estates	Liberty Drive
Attleboro	Oak Hill	1003 Oakhill Avenue
Attleboro	Red Oak Mobile Village	460 Collins Street
Attleboro	Sand Castle Mobile Home Park	11 Drawbridge Lane
Attleboro	Tripp Mobile Home Park	548 Kenyon Avenue
Auburn	American Mobile Home Park	751 Washington Street
Auburn	Mara Vista Trailer Park	131 Washington Street
Auburn	Marty's Mobile Home Park	3 Washington Street
Auburn	Mobile Home Service Center, Inc.	17 Washington Street
Auburn	Oak Hill Manufactured Housing Community	113 Washington Street
Auburn	Pleasant Trailer Park	496 Washington Street
Auburn	Southwest Retirement Community	5 Washington Street
Auburn	Whispering Pine Estates	47 Washington Street
Auburn	Winbrook Acres Cooperative Cooperation	120 Washington Street
Ayer	Hillside	25 Groton School Road
Ayer	Pine Knoll	11 Groton School Road
Barre	Water Wheel Village	Route 122, P.O. Box 339
Blechertown	Pine Valley Plantation	281 Chauncy Walker
Blechertown	Sportshaven Mobile Home Park	370 Mill Valley Road
Bernardston	Country Estates	75 South Street
Billerica	Lakeside Mobile Home Court	54 Oak Street
Boston	Boston Trailer Park	1515 VFW Parkway

Bourne	Pocasset Mobile Home Park	117-149 Barlows Landing Road
Bridgewater	High Pond Estates	10 High Pond Drive
Bridgewater	Stone Meadow	9 Stone Meadow Drive
Brimfield	Meadowbrook Acres	Palmer Road (9-B-5)
Brockton	Skyview Village	2013 Main Street
Brookfield	Brookfield Meadows	91 Town Farm Road
Brookfield	Nanatomqua Cooperative Corp	3 Nanatomqua Drive
Brookfield	Wagon Wheel Cooperative Corp	234 Rice Corner Road/13 Buckboard Pass
Carver	Cranberry Village	75 Cranberry Road
Carver	Meadow Woods	32 Melanie Lane
Carver	Pine Tree Village	75 Cranberry Road
Carver	South Meadow Village	36-10 South Meadow Village
Carver	Waterview Village	Silva Street
Charlton	Mobile Home Park	376 Worcester Road
Charlton	Trucker Trailer Park	74 Sturbridge Road
Chelmsford	Chelmsford Mobile Home Park	270 Littleton Road
Cheshire	Kitchen Brook	S. Street
Cheshire	Pine Valley	110 Dublin Road
Chicopee	Bluebird Acres	Old Fuller Road Exit
Chicopee	Gill Mobile Homes	1760 Westover Road
Chicopee	Harmony Homes	735 Memorial Drive
Chicopee	Holiday Circle	Sheridan Street
Chicopee	Holiday Park	705 Memorial Drive
Chicopee	Kontiki Village	Kontiki Circle off Memorial Drive
Chicopee	Liberty (Knollwood Estates)	95-142 Edbert Street
Chicopee	Sunrise Ridge Estates	Sheridan Street via Holiday Circle Park
Chicopee	Westover Trailer Park	Granby Road off Memorial Drive
Dalton	Victoria Villa	Park Terrace
Danvers	Danvers Trailer Park	96-98 Newbury Street
Danvers	Glen Mobile Home Park	200 North Street
Danvers	Shady Oaks Mobile Home Park	103 Newbury Street
Danvers	Skyview Park	466 Newbury Street
Dartmouth	Tidee Acres	79 Criss Riad
East Bridgewater	Meadowbrook	691 Union Street
Easton	Easton Mobile Home Community	305 Turnpike
Erving	Fairlane Mobile Homes	Old State Road
Fitchburg	Fitchburg Mobile Home Park	276 Lunenburg Street
Fitchburg	Woodland Mobile Home Park	1341 Rindge Road
Foxborough	Norfolk Park	131 Washington Street
Gardner	Rodfers Family Holdings, Inc	33 Waterview Drive

Gloucester	Cape Ann Camp Site	80 Atlantic Street
Gloucester	Little River Campground	4 Stanwood Point
Greenfield	Greenfield Country Estates Corp. Inc.	42 Adams Road
Halifax	Halifax Mobile Home Park	50 Sycamore Drive
Hatfield	Oakledge Mobil Park	139-143 West Street
Hingham	Pocohontas Trailer Park	170 Rockland Street
Hinsdale	Bissinville Estates	1109 Washington Road
Hinsdale	Country Road Coop. Inc.	70 Watson Road
Holbrook	Magons Trailer Park	166 Pond Street
Hudson	Meaeowbrook	2 Rebecca Avenue
Kingston	Conifer Green	South Street
Kingston	Town and Country Estate	Summer Street
Lakeville	Twin Coach Estates	Haskell Circle
Lanesborough	Nonamie	514 South Main Street
Lee	Allen's Mobile Home Park	130 Water Street
Lee	Twin Spruce	155 Water Street
Lenox	Berkshire Mobile Home Park	405 Pittsfield
Leominster	Dunwoody Mobile Home Park	602 North Main Street
Leominster	Meadow Acres	556 Central Street
Leominster	Whitehouse Park	1237 Central Street
Littleton	Littleton Motor Court	Route 2a
Ludlow	Circle Drive Trailer Park	89 West Avenue
Ludlow	Mountain View Mobile Home Park	229 Millet Street
Ludlow	Scott's Mobile Home Park	350 West Street
Lunenburg	Fairlane Mobile Home Park	2005 Mass. Avenue
Lunenburg	Medow Woods Mobile Home Park	1790 Mass. Avenue
Lunenburg	Whalom Mobile Home Village, Inc.	165 Summer Street
Malden	Town Line Estates	685 Broadway
Marlborough	Gulbankian's	1038 Broadmeadow Road
Marlborough	Jo-Len Village, Inc.	15 Colton Lane
Marlborough	Post Road Mobile Home Park	181 Boston Post - E
Mashpee	Lakeside Trailer Park	300 Nathan Ellis Highway
Mashpee	Otis Trailer Village/Johns Pond Campground	2 Back Road
Merrimac	Carriage Town Park	104 West Main Street
Merrimac	North Shore Community Mobile Home Park	107 East Main Street
Middleborough	Edgeway Mobile Home Park	Lyn Lane and Wesley Circle
Middleborough	Hillcrest Mobile Home Community	79 East Grove Street
Middleborough	Oak Point Mobile Home Park	200 Oak Point Drive
Monson	Rays Mobile Home Park	268 Palmer Road
Montague	Airport Mobile Home Park	259 Millers Falls Road
Montague	Laurel Park Realty Trust	6 Laurel Lane
New Bedford	Treasure Trailer Park	1044 Phillips Road

New Bedford	Tripps Mobile Home Park	2981 Acushnet Avenue
North Adams	Chieftain Realty-Willow Lane	1095 Mohawk Trail, Box 764
North Adams	Rock Manor Mobilehome Park	1100 Mohawk Trail, P.O. Box 1061
North Adams	Wheel Estates MHC	1588 S. Church Street, P.O. Box 780
North Attleborough	Guertin's Mobile Home Gardens	300 E. Washington Street
North Attleborough	In-Town Mobile Home Park	633 E. Washington Street
North Attleborough	Riverview Mobile Home Park	637 S. Washington Street
North Attleborough	Rustic Pines Estates	43 Woodchip Square
North Attleborough	Wamsutta Mobile Home Village	130 E. Washington Street
North Attleborough	Whisper Pines Mobile Home Park, Inc.	1174 S. Washington Street
North Reading	Lily Starlight Realty Trust	103 Main Street
North Reading	Perry's Trailer Park	142 Main Street
Norton	Norton Estates Co-op Corp.	250 Mansfield Avenue
Norton	Norton Mobile Home Estate Realty Trust	157 Mansfield Avenue
Norton	Willowcrest Estates	27 Smith Street
Norwell	Helen's	447 Washington Street
Norwell	The Glen	214 Washington Street
Orange	Brookside Mobile Homes Park Co-Op	12 Columbia Avenue
Orange	Leisure Woods Estates, Inc	519 East River Street
Orange	Sheridan's Mobile Home Park	76 Daniel Shays Highway
Otis	Bartow's Mobile Home Park	1514 Monterey Road
Oxford	Oxford Adult Trailer Park	9 Leicester Street
Oxford	Skyline Trailer Park	10 Southbridge Road (Rte 20)
Palmer	Quaboag Valley Co-Op	63 Quaboag Trail
Peabody	Family Estates Cooperative	154 Newbury Street
Peabody	Haven Circle Cooperative	41 Pine Street
Peabody	Little Trailer Park	165 Newbury Street
Peabody	Mac's Park	176 Newbury Street
Peabody	Newbury Trailer Park	259 Newbury Street
Peabody	Oak Ledge Heights Co-Op	161 Newbury Street
Peabody	Park Place Mobile Home	266 Newbury Street
Peabody	Peabody Mobile Estates	286 Newbury Street
Peabody	Peabody Mobile Home Park	252 Newbury Street
Peabody	Pine Grove	261 Newbury Street
Peabody	Red Hill Trust	251 Newbury Street
Peabody	Whispering Meadows	278 Newbury Street
Pelham	Amherst Road MHP	21 Amherst Road
Pepperell	Clark's Retirement Homes Park	4 Mason Street

Pepperell	Green Acres Mobile Home Park	38 River Road
Pepperell	Suburban Village Mobile Home Park	18 Maple Street
Pittsfield	Allendale Pines Mobile Home Park	245 Cheshire Road
Pittsfield	Brownie's Mobile Court	11 Nottingham Drive
Pittsfield	Lake Onota Village	Valentine Road
Plainville	Higgins Mobile Homes - Brookside Village	160 Washington Street
Plainville	Higgins Mobile Homes - Sunset Acres	45 Washington Street
Plainville	Killarny Estates	18 Taunton Street
Plymouth	Long Pond Village Mobile Homes	54 Headlands Drive
Plymouth	Mayflower Mobile Estates	Minuteman Lane
Plymouth	Pinehurst Mobile Home Village	173 South Meadow Road
Plymouth	Plimouth Commons Co-op Corp.	1-A Community Drive
Plymouth	Plymouth Mobile Estates Co-op Corp	Pilgrim Trail
Plymouth	Village at Squirrel Run	30 Carver Road
Plymouth	WestWood Vilalge	Willowbend Boulevard
Raynham	Shady Acres Mobile Home Park	1540 Broadway
Raynham	The Pine Hill Estates	272 Hill Street
Revere	Lee's Trailer Park	418 Revere Beach Pathway
Rockland	Hillcreast	401 Beech Street
Rockland	Leisurewoods	31 Leisurewoods Drive
Russell	Prime-Lo Development, Inc.	51 Park Avenue
Salisbury	Carmel Realty Trust	114 Lafayette Road
Salisbury	Heritage Park Homeowners Coop	194 Lafayette Road
Sandwich	Dunroamin Trailer Park	5 John Ewer Road, Route 3
Saugus	Boulder Mobile Home Park	1591 Broadway
Saugus	Luongo Realty Trust	5 Hawkes Street
Saugus	Orlandella Mobile Home Park	104 Broadway
Saugus	Saugus Mobile Park	846 Broadway
Shirley	Acme Trailer Park	154 Great Road
Shirley	Briarwood Trailer Park	83 Front Street
Shirley	Red Oakes	Kittredge Road
Shirley	Wayside Trailer Park	47 Wayside Park, Shirley, MA
Shrewsbury	Edgemere Trailer Park	151 Hartford Turnpike
Springfield	Birchambend Mobile Home	Grochmal Avenue
Springfield	Boston Road Mobile Home	1157 Boston Road
Springfield	Eastwood Estates	Lamplighter Lane and Contessa Avenue
Springfield	Springfield Mobile Park	Wollaston & Shumway Street
Stockbridge	Berkshire Mobile Home Park	405 Pittsfield

Stockbridge	Brookside Mobile Home Park	Washington Mountain Road
Stockbridge	Tiwn Spruce	155 Water Street
Stoughton	Kelley's Trailer Park	1156 Park Street
Sturbridge	Bob's Retirement Home Park	365 Main Street
Sturbridge	Cedar Lake Mobile Home Park	8 Birch Street
Sturbridge	Sturbridge Retirement Community	1 Kelly Road
Taunton	Colonial Estates	6 Minute Man Road
Taunton	Leisure Woods at Taunton	50 Highland Street
Taunton	Oak Hill Mobile Home Park	97 Cypress Road
Taunton	Radante Estates	200 Norton Avenue
Taunton	Rocky Knoll Estates	193 Tremont Street
Taunton	Willow Terrace	22 Waverly Street
Templeton	Meadow Lane Trailer Park	Patriots Road
Templeton	Willow Trailer Park	Patriots Road
Tewksbury	Lakeside Mobile Home Court, Inc.	54 Oak Street
Tyngsborough	Berry's Grove Campground, Inc.	35 David Street
Wales	Brookside Village	Stafford Road
Ware	Oakwood Mobile Home Park	51 Monson Turnpike Road
Ware	Pond Brook Park	221 Upper North Street, STE 1
Wareham	Garden Homes Estates East	3040 Cranberry Highway
Wareham	Garden Homes Estates North	2750 Cranberry Highway
Wareham	Garden Homes Estates Pines	2750B Cranberry Highway
Wareham	Garden Homes Estates South	3132 Cranberry Highway
Wareham	Great Hill Estates Retirement Community	2400 Cranberry Highway
Wareham	GreenTree Estates	9 Charlotte Furnace Road
Wareham	Holly Heights Cooperative, Inc.	9 Judith Street
Wareham	Lakeside Mobile Home Park	3030 Cranberry Highway
Wareham	Mogan's Mobile Home Park, Inc.	3012 Cranberry Hwy, East Wareham, MA 02538
Wareham	Onset Beach Resort Mobile Home Park	32 Kins Ct, Onset, MA 02558
Wareham	Red Wing Estates	2900 Cranberry Highway
Wareham	Royal Crest	2340 Cranberry Highway
Wareham	Siesta Village Mobile Home Park	10 Charlotte Furnace Road
Wareham	Silver Lake Mobile Home Park	3024 Cranberry Highway
Wareham	Swifts Beach Mobile Home Park	8 Swifts Beach Road
Warren	Evergreen Mobile Home Park, Route 19	P.O. Box 1175

Warren	Heritage Mobile Home Park	Unknown
Webster	Woods Grove Realty	Ash Street
Wellfleet	Harborside Village	200 Rudys Way
Wellfleet	Massasoit Hills Trailer Park	West Road
Wendell	Mountain Laurel Mobile Court	51 New Salem Road
West Bridgewater	Beacon Park Realty Trust	855 N. Main Street
West Bridgewater	Matfield Woods Mobile Home Park	324 W. Center Street
West Brookfield	Madden Estates	Madden Road
West Springfield	Kaufco-Bh, Inc.	Brush Hill Avenue
West Stockbridge	Gennari's Mill Pond Trailer Park	Albany Road, Route 41
Westborough	Wayside Mobile Home Park	165 Turnpike Road
Westfield	Arbor Mobile Home Park	Klondike Avenue
Westfield	Hampden Village	Root Road
Westfield	Henry's Mobilehome Park	Southampton Road
Westfield	Liberty Manor	Russellville Road
Westfield	Oaks Mobilehome Park	404 Southwick Road
Westfield	Riverbend	189 Springfield Road
Weymouth	Nob Hill Estates	689 Washington Street
Williamstown	Pines Lodge	Cummings Avenue
Williamstown	The Spruces	60 Main Street
Winchendon	Glenwood Mobile Home Park	142 Glenallen Street
Winchendon	Jacobs Landing - Phase II	142 Glenallen Street
Worcester	End of the Lane, Inc	1 Rose Lane
Worcester	Marty's Mobile Home Park, Inc.	557 Southwest Cutoff
Worcester	Southwest Manufactured Housing Community	557 Southwest Cutoff
Yarmouth	Bass River Trailer Park	698 Willow Street

Appendix 2: Photos of Previous Revere, MA Manufactured Home Park

